

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CONCORD MANAGEMENT AND
CONSULTING LLC,**

Defendant.

Crim. No. 18-CR-32-2 (DLF)

**GOVERNMENT’S SECOND SUPPLEMENTAL RESPONSE TO DEFENDANT’S
MOTION TO DISCLOSE *EX PARTE* COMMUNICATIONS BETWEEN THE COURT
AND THE GOVERNMENT REGARDING THE GOVERNMENT’S INTENTION TO
SEEK A SUPERSEDING INDICTMENT**

The United States of America, by and through undersigned counsel, respectfully submits two additional proposed redactions to those proposed in its Response to Defendant Concord Management and Consulting’s Motion to Disclose *Ex Parte* Communications Regarding the Government’s Intention to Seek a Superseding Indictment [Dkt. No. 231] and its Supplemental Response to Defendant Concord Management and Consulting’s Motion to Disclose *Ex Parte* Communications Regarding the Government’s Intention to Seek a Superseding Indictment [Dkt. No. 233]. The government hereby submits one additional proposed redaction to the Court’s October 25, 2019 Minute Order, and one proposed redaction to the government’s Supplemental Notice Regarding Superseding Indictment, filed on October 29, 2019. These proposed redactions are consistent with the parties’ discussion with the Court during the sealed telephonic hearing of November 7, 2019.

Respectfully submitted,

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